

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington

August 13, 2020

WILLIAM M. McCOOL, Clerk

By Seamus Kattur Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

CASE NO. CR20-122 JLR

INDICTMENT

v.

MYLES STEELE and CAMERON FERNER,
Defendants.

The Grand Jury charges that:

COUNT 1

(Possession of Controlled Substances with Intent to Distribute)

On or about May 15, 2020, near Blaine, in Whatcom County, within the Western District of Washington, and elsewhere, the defendants, MYLES STEELE and CAMERON FERNER, did knowingly and intentionally possess, and aid and abet the possession of, with intent to distribute, methamphetamine and cocaine, each of which are controlled substances under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

INDICTMENT

United States v. Steele et al. - 1

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

1 All in violation of Title 21, United States Code, Sections 841(a)(1),
 2 841(b)(1)(A)(viii) (methamphetamine), and 841(b)(1)(C) (cocaine), and Title 18, United
 3 States Code, Section 2.

4 **COUNT 2**

5 **(Possession of Heroin with Intent to Distribute)**

6 On or about May 15, 2020, near Blaine, in Whatcom County, within the Western
 7 District of Washington, and elsewhere, the defendant, CAMERON FERNER, did
 8 knowingly and intentionally possess, and aid and abet the possession of, with intent to
 9 distribute, heroin, a controlled substance under Title 21, United States Code, Section 812.

10 All in violation of Title 21, United States Code, Sections 841(a)(1) and
 11 841(b)(1)(C), and Title 18, United States Code, Section 2.

12 **ALLEGATIONS OF FORFEITURE**

13 The allegations contained in Counts 1 and 2 of this Indictment are hereby
 14 realleged and incorporated by reference for the purpose of alleging forfeiture.

15 Pursuant to Title 21, United States Code, Section 853, upon conviction of the
 16 felony offenses charged in Counts 1 and 2 above, the defendants, MYLES STEELE and
 17 CAMERON FERNER, shall forfeit to the United States of America any property
 18 constituting, or derived from, any proceeds obtained, directly or indirectly, as the result
 19 of such offenses and any property used, or intended to be used, in any manner or part, to
 20 commit, or to facilitate the commission of, the offenses.

21 If any of the property described above, as a result of any act or omission of the
 22 defendants:

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been placed beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be divided without
2 difficulty,
3 it is the intent of the United States, pursuant to Title 21, United States Code, Section
4 853(p), to seek the forfeiture of any other property of the defendants, up to the value of
5 the above-described forfeitable property.

7 A TRUE BILL:

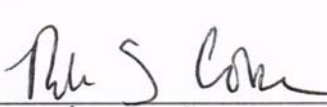
8 DATED: *August 13, 2020*

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10 *Signature of foreperson redacted*
11 *pursuant to the policy of the Judicial*
12 *Conference of the United States*

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FOREPERSON


BRIAN T. MORAN
United States Attorney


GRADY J. LEUPOLD
Assistant United States Attorney


ANDRÉ M. PEÑALVER
Assistant United States Attorney